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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

29 RICHARD KADREY, *et al.*,  
30 Individual and Representative Plaintiffs,  
31 v.  
32 META PLATFORMS, INC., a Delaware  
33 corporation;  
34  
35 Defendant.

36 Case No. 3:23-cv-03417-VC-TSH

37 **DECLARATION OF MICHELLE WOODHOUSE**  
**IN SUPPORT OF DEFENDANT'S SUPPORT**  
**FOR ADMINISTRATIVE MOTION TO**  
**CONSIDER WHETHER ANOTHER PARTY'S**  
**MATERIAL SHOULD BE SEALED**

1 I, Michelle Woodhouse, hereby declare:

2 1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”). I  
3 have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness,  
4 could and would testify competently thereto.

5 2. I make this declaration in support of Defendant’s Support for Administrative Motion  
6 to Consider Whether Another Party’s Material Should Be Sealed (“Motion”). The Motion seeks to  
7 have the following document entirely sealed:

Document	Sealing Request
Exhibit A to Declaration of Holden Benon in Support of Plaintiffs’ Reply to Defendant Meta Platforms, Inc.’s Opposition to Motion to Amend Case Management Schedule (“Benon Declaration”)	<ul style="list-style-type: none"> <li>• Entire document</li> </ul>

14  
15 3. Exhibit A to the Benon Declaration comprises excerpts of internal Meta documents  
16 relating to AI development. These excerpts include highly sensitive information regarding the  
17 technical development and components of Meta’s AI models and include internal discussion of this  
18 information. Public disclosure of the information in these documents exposes Meta to the risk of  
19 competitive harm.

20 4. Public disclosure of the information contained in the above-referenced exhibit  
21 exposes Meta to the risk of competitive and financial harm by revealing Meta’s non-public trade  
22 secret information and technical data pertaining to its generative AI offerings. For this reason,  
23 Meta takes steps to carefully protect the confidentiality of this sort of information

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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct

3 Executed in Washington, DC on this 11<sup>th</sup> day of October, 2024.

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6 Michelle Woodhouse

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